ENGINEERING MANAGEMENT SUPPORT INC.

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VIA: Electronic Mail

March 10, 2014

U.S. Environmental Protection Agency Region VII SUPR/MOKS 11201 Renner Boulevard Lenexa, KS 66219

ATTENTION: Mr. Dan Gravatt

SUBJECT: Monthly Status Report – February 2014
West Lake Landfill Operable Unit 1, Bridgeton, Missouri

Dear Mr. Gravatt,

On behalf of Cotter Corporation (N.S.L.), Bridgeton Landfill, LLC., Rock Road Industries, Inc., and the United Sates Department of Energy (the "Respondents"), Engineering Management Support Inc. (EMSI) submits the attached status report for the month of February 2014 required by paragraph 56 of the West Lake Landfill Administrative Order on Consent, Docket No. VII-93-F-005. If you have any questions or desire additional information related to this status report or any other aspect of the project, please do not hesitate to contact me.

Sincerely, ENGINEERING MANAGEMENT SUPPORT, Inc.

Paul V. Rosasco, P.E.

Distribution:

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Monthly Status Report – February 2014 West Lake Landfill Operable Unit 1 Bridgeton, Missouri

This status report has been prepared by Engineering Management Support Inc. (EMSI) on behalf of Cotter Corporation (N.S.L.), Bridgeton Landfill, LLC (formerly known as Laidlaw Waste Systems [Bridgeton] Inc.), Rock Road Industries, Inc., and the United States Department of Energy (the "Respondents") for Operable Unit - 1 (OU-1) at the West Lake Landfill as required by paragraph 56 of the West Lake Landfill Administrative Order on Consent, Docket No. VII-93-F-005.

1. Work Performed During February 2014

Project Planning

A draft Core Sampling (Phase 2) Work Plan for Bridgeton Landfill – West Lake Landfill was submitted on November 15, 2013. EPA comments on the draft work plan were received on December 4, 2013. Work was performed toward preparation of a Core Sampling Work Plan (Phases 1B, 1C and 2) in December. A draft of the Core Sampling (Phase 1B, 1C and 2) Work Plan was submitted to EPA and MDNR for review on December 18, 2013. EPA comments on the draft work plan were received on December 26, 2013. The final Phase 1B, 1C and 2 Core Sampling Work Plan was submitted on January 8, 2014.

Work plans for evaluation of potential impacts from a possible Subsurface Smoldering Event in Area 1 or 2 and for evaluation of potential impacts from a possible tornado impact to Area 1 or 2 were submitted to EPA and MDNR on July 24, 2013. EPA approved these work plans on July 30, 2013.

EPA comments on the various work plans prepared for the additional Supplemental Feasibility Study evaluations were received on August 16, 2013. A meeting was held with EPA and MDNR on September 24, 2013 to discuss comments on the work plans for the additional SFS evaluations. Revisions to the work plans for evaluations of alternative Area 2 depths and volumes, apatite treatment technologies and additional discount rate were prepared and submitted to EPA and MDNR on October 31, 2013. A revised work plan for evaluation of alternative landfill cover designs was submitted to EPA and MDNR on February 21, 2014.

A draft Remedial Design Work Plan was submitted to EPA in November 2008. In accordance with direction from EPA, all work on design of the ROD-selected remedy has been put on hold.

Fieldwork - Sample Collection/Analysis

In accordance with the Phase 1B, 1C and 2 Core Sampling Work Plan, drilling was conducted to obtain lithologic data and soil samples from selected Phase I GCPT locations and to obtain downhole gamma readings from locations where the GCPT equipment encountered drilling refusal at shallow depths. Soil samples obtained in conjunction with the Rotosonic drilling were submitted to Eberline Laboratory for radioisotopic analyses.

An additional set of groundwater samples were obtained from newly installed bedrock monitoring well clusters PZ-209, PZ-210, PZ-211 and PZ-212. The samples were submitted to Test America for volatile organic, trace metal, and anion analyses and to Eberline Laboratory for radiochemistry analyses.

Report Preparation

A report on the results of the October 2013 groundwater monitoring activities was completed and submitted to EPA and MDNR on February 23, 2014.

The monthly progress report for January 2014 was prepared and submitted to EPA and MDNR on February 10, 2014.

During February, work was performed toward preparation of a comprehensive groundwater report.

Project Management

None.

Meetings

None.

Correspondence

Additional comments on the Fate and Transport Work Plan were received from EPA on February 10, 2014.

2. Analytical Data Collected During This Reporting Period

None.

3. Work Scheduled to be Performed during March and April 2014

Work will be performed toward preparation of a summary report that presents the data from the four additional groundwater monitoring events (July/August 2012, April 2013, July 2013, and October 2013) and provides interpretation of the results for the four events.

Evaluations to estimate alternative volumes for development of a partial excavation alternative for Area 2 will be conducted.

Phase 1B, 1C and 2 drilling and GCPT work will continue to be performed during March and depending upon the results, possibly extend into April, 2014.

The two remaining Work Plans for the additional SFS evaluations (Partial Excavation, and Fate and Transport Evaluations) will be updated as necessary to address EPA and MDNR comments and the discussions at the September 24, 2013 meeting, EPA's additional comments on the fate and transport work plan, and EPA direction relative to the partial excavation alternative based on the results of the volume estimates for the alternative partial excavation scenarios currently being developed.

4. Problems Encountered

None.